

OUTTEN & GOLDEN LLP

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**NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.**

*Rachel M. Kleinman
40 Rector St.
New York, NY 10006

**Application for admission pending*

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

GEORGE MANDALA and CHARLES
BARNETT, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NTT DATA, INC.,

Defendant.

Case No. 18 Civ. 6591 (CJS)

**DECLARATION OF OSSAI MIAZAD IN SUPPORT OF
PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS THE CLASS ACTION COMPLAINT**

I, Ossai Miazad, declare under penalty of perjury as follows:

1. I am a partner at the firm of Outten & Golden LLP ("O&G") in New York, New York, Plaintiffs' counsel herein, and co-chair of its Discrimination and Retaliation Practice Group. O&G is a 60+ attorney firm based in New York City, with offices also in Chicago, San Francisco, and Washington D.C., that focuses on representing plaintiffs in a wide variety of employment matters, including individual and class action litigation that involve criminal history, discrimination, and wage and hour claims, as well as contract and severance negotiations.

2. I am one of the lawyers primarily responsible for prosecuting Plaintiffs' claims.

3. I make these statements based on personal knowledge and would so testify if called as a witness at trial.

4. Attached hereto as **Exhibit A** is a true and correct copy of the Amended Petition and Jury Demand, ECF No. 3-1, in *Williams v. Wells Fargo Bank, N.A.*, No. 15 Civ. 38, 2015 WL 13753220 (S.D. Iowa Aug. 6, 2015).

5. Attached hereto as **Exhibit B** is a true and correct copy of the New York State Assembly's Memorandum in Support of the Legislation, Bill No. 10288A, 2007-2008 Term.

Dated: New York, New York
December 12, 2018

By: /s/ Ossai Miazad
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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, I electronically filed the ***Declaration of Ossai Miazad in Support of Plaintiffs' Memorandum of Law in Opposition to Defendant's Motion to Dismiss the Class Action Complaint*** with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the CM/ECF participants on this case.

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By: /s/ Ossai Miazad
Ossai Miazad